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## DEPARTMENT OF NATURAL RESOURCES

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MID 120 1911 517

May 10, 1985

Ms. Jeanne Griffin Technical Support Unit U.S. EPA - Region V 230 South Dearborn Street Chicago, Illinois 60604

Dear Ms. Griffin:

By this letter I am providing comment on the Site Inspection Reports for two sites - Barta Farms/Mid West Abrasives and Michigan Department of Management and Budget/Federal Surplus-recently submitted to our office for review.

Barta Farms/Midwest Abrasives: Generally, I am in agreement with the report's statements, but there are a few points I would like to address. In Part 5 (II), I am wondering what the basis was for giving an endangered status to the non-community well. This implies knowledge of a groundwater contaminant plume upgradient from the well and I am not aware of any data that confirms groundwater has been affected.

The report also references "soil contamination". While soils were contaminated at one time, I am curious as to why no soil samples were taken to confirm whether or not soils are still contaminated. As phenols are highly water soluble, any soil contamination has probably moved some distance, been attenuated or ended up as groundwater contamination. I would like to suggest soil samples be taken and monitor wells be installed.

Finally, the map included in the SI incorrectly identifies northward direction as being on the top of the map. According to our files and the topo map, Smith Road runs north-south, making the left margin the north-ward direction (see enclosed map).

Michigan Department of Management and Budget/Federal Surplus: I have several comments to make about this site. The contact person should be Karen Kligman, Michigan Department of Natural Resources, (517-322-1300), not Brady Boyce. In Part 2 (IV), why is magnesium listed? In Part 5 (II), why is a community well shown as "affected"? To our knowledge, the deep bedrock aquifer has not been contaminated by wastes previously on site.

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## Hooker Chemical (Occidental), Muskegon County

The score should be revised to reflect two unaddressed concerns: C-56 (and related compounds) contaminated soil which remains on site and potential air route exposure.

An estimated 80,000-100,000 cubic yards of soil contaminated with C-56 and related compounds and solvents remains near "area 9". Based on samples collected in 1983, an estimated 500,000 pounds of C-series chemicals remain in the soils. The pertinent information is enclosed. This area has not been addressed and should be included in the site ranking and evaluation.

Another area of concern is the potential air route release which should be evaluated and is associated with this soil contamination area. Heavy odors and vapor clouds were reported by MDNR personnel during the above mentioned sampling effort. The area is estimated to be 50 yards x 250 yards or 112,500 square feet of contaminated soil exposed at the surface.

In addition to these comments, please find enclosed copies of the State of Michigan's site descriptions for each site that we have on file. We hope that these comments and additional pieces of information will contribute to your efforts.

Based on the review of the HRS scoring and our own Site Assessment System, we would like to submit the Hooker Chemical, and the Oakville-Waltz Road Disposal area packages as candidates for the National Priorities List (NPL).

Thank you again for this opportunity and if we can be of further assistance, please feel free to contact us.

Sincerely,

Gary Klepper, Chief Site Assessment Unit

Sary Klepper

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